

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION

UNITED STATES OF AMERICA :

vs. :

RHONDA EVERETT :

DEFENDANT :

CRIMINAL NO. 5:13-CR-28-1(CAR)

VIOLATIONS:

18 U.S.C. 371

18 U.S.C. 1028(a)(7) &

18 U.S.C. 1028(b)(2)(A)

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE  
CONSPIRACY  
18 U.S.C. 371

(i/c/w 287, 1028(a)(7), 641)

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MIDDLE DISTRICT OF GEORGIA

1. Beginning on or about January 5, 2012, and continuing through June 19, 2012, in the Middle District of Georgia and elsewhere, Rhonda Everett, the Defendant, and others known and unknown to the United States Attorney, unlawfully, willfully, and knowingly did combine, conspire, confederate and agree together and with each other to commit offenses within the United States, as follows:
  - a. False Fictitious, or Fraudulent Claims, in violation of 18 U.S.C. 287;
  - b. Identity Theft, in violation of 18 U.S.C. 1028(a)(7);
  - c. Receiving Stolen Government Property, in violation of 18 U.S.C. 641.

### **The Object of the Conspiracy**

2. It was a part and object of the conspiracy that the Defendant and others, known and unknown, would obtain personal identification information from unsuspecting individuals who had received services at the Salvation Army, located in Macon, Georgia. The conspirators would then use the names, dates of birth and social security numbers for the purpose of preparing false and fraudulent tax returns in the names of the individuals whose identities had been taken. After filing the false and fraudulent returns, the conspirators would receive refunds in the form of prepaid debit cards and U.S. Treasury checks in the mail, which were government funds, received by the coconspirators, to which they were not entitled. It was further an object of the conspiracy to defraud the United States by causing false refunds to be issued and received by the conspirators, who were not entitled to receive them.

### **Overt Acts of the Conspiracy**

3. On or about February 22, 2012, Defendant, Rhonda Everett, obtained thirty-five (35) personal identities and means of identification, including names, dates of birth, and social security numbers, which had originated from the Salvation Army in Macon, Georgia, and delivered them to a United States Secret Service Agent, who was acting in an undercover capacity, in exchange for \$200.00.
4. On or about February 22, 2012, Defendant provided the \$200.00 to co-conspirator #1, whose identity is known to the United States Attorney, and co-conspirator #1 then paid \$50.00 to the Defendant.

5. On various dates in 2012, Defendant Rhonda Everett allowed co-conspirator #1 and other conspirators to use her residence address of 3842 Emory Drive, Macon, Georgia, to be used as the address for receiving multiple false tax refunds.

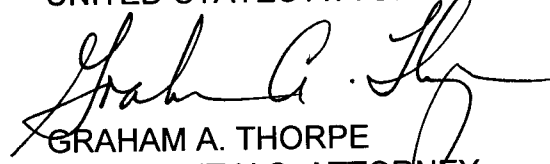
All in violation of 18, United States Code, Section 371 i/c/w 18, United States Code, Section 287, 18, United States Code, Section 1028(a)(7), 18, United States Code, Section 641.

**Count Two  
Identity Theft  
18 U.S.C. 1028(a)(7)**

On or about February 22, 2012 in the Middle District of Georgia, the defendant, Rhonda Everett did knowingly transfer and use, in and affecting interstate and foreign commerce, without lawful authority, a means of identification of another person, to wit, the name of R.L.C., together with his date of birth, social security number, and a copy of his North Carolina Identification Card, with the intent to commit, and to aid and abet, and in connection with unlawful activity that constitutes a violation of Federal law, to wit, False Fictitious, or Fraudulent Claims, in violation of 18 United States Code, Section 287.

All in violation of Title 18, United States Code, Section 1028(a)(7) and 18 United States Code 1028 (b)(2)(A).

MICHAEL J. MOORE  
UNITED STATES ATTORNEY

  
GRAHAM A. THORPE  
ASSISTANT U.S. ATTORNEY